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Attorneys for Defendants
C. R. Bard, Inc. and
Bard Peripheral Vascular, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products Liability
Litigation,

No. 2:15-MD-02641-DGC

**DEFENDANTS' NOTICE OF
LODGING UNDER SEAL BARD'S
MOTION FOR SUMMARY
JUDGMENT AS TO PLAINTIFF
CAROL KRUSE'S CLAIMS**

CAROL KRUSE, an individual,

(Assigned to the Honorable David G.
Campbell)

Plaintiff,

v.

C. R. BARD, INC., a New Jersey
corporation and BARD PERIPHERAL
VASCULAR, INC., an Arizona
corporation,

Defendants.

Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively “Bard”), pursuant to the Stipulated Protective Order (Doc. 269) and Local Civil Rule 5.6, file this Notice of Lodging Under Seal Bard’s Motion for Summary Judgment as to Plaintiff Carol Kruse’s Claims. Bard’s Motion and Memorandum of Law in Support of Motion for Summary Judgment quotes, references, or characterizes Plaintiff’s personal healthcare information that is protected under HIPAA and confidential under the Stipulated Protective Order. Defendants have notified Plaintiff of their intent to file this Notice of Lodging. Because the documents lodged under seal and materials lodged redacted only relate to Plaintiff’s personal healthcare information, Defendants note that it is Plaintiff’s burden to file a motion to seal. A list of materials lodged under seal and lodged redacted, are attached hereto as Exhibit A.

RESPECTFULLY SUBMITTED this 28th day of August, 2017.

s/Richard B. North, Jr.
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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of August 2017, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

s/Richard B. North, Jr.
Richard B. North, Jr.

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EXHIBIT A

DOCUMENTS PROPOSED TO BE LODGED REDACTED

Defendants request they be permitted to lodge redacted portions of the following documents:

Defendants' Motion and Memorandum of Law in Support of Motion for Summary Judgment as to Plaintiff Carol Kruse's Claims

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